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December 15, 2014

**VIA CM/ECF**

Honorable Judge Renee Marie Bumb, U.S.D.J.  
Mitchell H. Cohen Building & US Courthouse  
4<sup>th</sup> & Cooper Streets, Room 1050  
Camden, NJ 08101

**Re: Barton v. Mid-Atlantic Flooring Ventures, Inc., et al.**  
**Civil Case No.: 1:13-cv-04592**

Dear Judge Bumb:

This firm represents the defendants in this matter. We are in receipt of the Affidavit filed by Plaintiff's counsel on December 14, 2014 at the direction of the Court. Defendants' respectfully submit that the thirty page Affidavit goes far beyond what the Court requested and presents both factual and legal arguments that are either the same or in addition to what was previously submitted. Defendants will gladly respond to those arguments if the Court deems it necessary.

In addition, paragraph 67 of the Affidavit states that "Plaintiff filed the Warrant [of Satisfaction of Judgment] a mere fifteen days later." However, a review of the docket and correspondence reveals that no Warrant was ever filed. We believe that Plaintiff's counsel was referring to the filing of his motion, which was filed fifteen days later, rather than the Warrant.

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Thank you for your attention to this matter.

Respectfully submitted,

***FOX ROTHSCHILD LLP***

/s/ Ian D. Meklinsky  
Ian D. Meklinsky

cc: Robert Hagerty, Esq. (via electronic filing)